because they were precluded from discussing technical aspects of SBC's OSS or overall business procedures or rules for pre-ordering and ordering.

SBC's narrow interpretation of its requirements under the Merger Order was inappropriate and unnecessary. It became clear at several points during the meetings that some SBC personnel present in the room knew the answers to CLEC questions regarding matters "outside the scope of the POR." For example, at the February 1 workshop, in response to a CLEC question regarding an 850 EDI transaction, George Phillips, an SBC subject matter expert sought permission from the SBC representative running the workshop by inquiring "Can I answer the question?" prior to providing an answer.[6] Similarly, Carol Chapman, another SBC subject matter expert inquired "Can I answer his Verigate question?" prior to offering an answer. Other similar exchanges occurred during the meeting.[7] Because SBC imposed an unduly restricted scope on the discussions in the workshops, and thereby prevented CLECs from addressing all of their concerns regarding SBC's OSS, SBC failed to comply with the Merger Order.

B. No written agreement

SBC indicated to CLECs that it would file an addendum to its Phase I POR by February 7, 2000. However, SBC did not make that addendum available to CLECs for review or signature prior to the February 7 filing date. Thus, CLECs cannot verify whether SBC's filing will accurately and fully reflect agreements reached during the February 2, 2000 workshop. Until CLECs have been allowed to review the POR addendum, then, SBC cannot have fulfilled its obligation to file a written document reflecting agreements reached with CLECs.

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[6] February 1 Transcript, 118.

C. No Change Management Process

As part of its obligations during the Phase II workshops, SBC was required to obtain written agreement to a change management process, including a 12- month forward-looking view of process changes and deployment schedule.[8] SBC did not fulfill this requirement. Although SBC did indicate that the change management process should be considered by CLECs as an alternative method of resolving concerns, no specific discussion of the process was provided. Indeed, CLECs specifically asked what topics considered to be "outside the scope of the POR" by SBC would be appropriate for the change management process, but SBC could not provide a definitive answer. Further, SBC provided a list of rollout dates for modifications to its OSS, but those dates did not provide a 12-month forecast for OSS implementation as required by the Merger Order because the forecast of rollout dates for modifications to Datagate and EDI ended in December, 2000.

III. ISSUES ON WHICH AGREEMENT WAS REACHED

On the concluding day of the February workshops SBC responded to specific CLEC requests for modifications or commitments to its Phase I POR and agreement was reached on 13 items. Although SBC indicated it would file an addendum with the Commission providing a detailed description of those modifications and commitments, the CLECs will provide a brief summary to ensure the Commission has a consistent understanding of the areas of agreement.

1. **Additional Data Elements in Loop Qualification:** CLECs reiterated that there are numerous data elements to which they require access during the loop

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[7] See, e.g. February 1 Transcript, 196.

qualification process that SBC did not list in its POR.[9] Initially SBC took the position that additional loop makeup data elements should be negotiated through the change management process,[10] but SBC eventually agreed it has in its databases, and can make available, an additional 18 data elements no later than December 2, 2000 to CLECs during the loop qualification process. Although CLECs agreed they will benefit from the availability of additional data elements, they expressed concern that SBC will not commit to make them available on a faster timeframe, because SBC has been on notice since November 3, 1999, that CLECs required this additional data.[11] (See Item 11 below). The list of additional data elements is as follows: 1) presence/location of repeaters, 2) quantity of repeaters, 3) type of repeaters, 4) type of plant (aerial or buried), 5) composition of loop (copper or fiber), 6) portion of loop of each composition type, 7) availability of spare loops, 8) quantity of bridged-taps, 9) number of occurrences of bridged taps, 10) quantity of low pass filters, 11) location of low pass filters, 11) quantity of range extenders, 12) location of range extenders, 13) number of gauge changes, 14) location of pair gain, 15) location of digital loop carrier ("DLC"), 16) quantity of DLC, 17) presence of remote switching unit, and 18) type of remote switching unit.[12] In addition to these discrete data elements, SBC acknowledged its requirement under the Rhythms/Covad arbitration with

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[8] Merger Order, Appendix C, paragraph 15c(2).

[9] Transcript, Feb. 1, 106:12107:6. SBC listed 19 data elements in its POR that it was willing to make available during its loop qualification process. These data elements are scheduled to be available March 18, 2000.

[10] Transcript, Feb. 1, 123:18-124; 135:1-21.

[11] Transcript, Feb. 1, 136:22-137:9.

[12] Transcript, Feb. 1, 140; 142-144:

SBC in Texas to provide electronic access to all records, databases and back-end systems to which internal personnel have access. SBC indicated such capabilities would be available in Texas by April 29, 2000. However, SBC would not discuss how it intends to make the same systems and information available to all CLECs in its 13-state region as required by the UNE Remand Order. Indeed, SBC indicated that steps it must take to comply with the UNE Remand Order were "outside the scope of the POR."

2. **Elimination of New Mandatory Tracking Number:** SBC had proposed adding a new mandatory field to its ordering systems that required CLECs to obtain and provide a so-called tracking number on xDSL loop orders. The tracking number was to be obtained through SBC's loop qualification process. Without the number, CLEC orders would either be rejected, or would be forced out of the ordering process for manual lookup of the tracking number.[13] In either case, CLECs would be seriously disadvantaged compared to SBC's own operations because CLEC orders would not flow through SBC's ordering system on a mechanized basis. There was also a serious question raised by CLECs whether the tracking number could be obtained through Verigate, the user interface currently used by many CLECs. SBC agreed to eliminate the mandatory tracking number from its ordering system. Thus, SBC assured CLECs that they will be able to place an order for an xDSL loop, and leave the field for the tracking number blank with no negative effects (i.e., the order will not be rejected or dropped out for manual processing).

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[13] Transcript, Feb. 2, 383

3. **Elimination of Loop Qualification Requirements for Some Loops:** CLECs requested that SBC eliminate its mandatory loop qualification requirements for loops that are 12K feet or less in length. SBC agreed to this request and indicated that once a pre-qualification is performed on these loops, an order may flow through immediately. This modification will be made available no later than July, 2000.

4. **Charges for Loop Qualification:** CLECs requested that they only be charged for loop qualification if an order is actually placed. SBC would not commit to such pricing policy, but indicated it is currently planning to adopt such a policy, and would make an affirmative statement in its POR addendum regarding charges for loop qualification.

5. **Definition of actual Loop Length:** CLECs requested clarification of what portion of a loop is included in an actual loop length calculation. SBC clarified that actual loop length comprises the feeder portion of the loop and the distribution portion of the loop up to the customer terminal. The figure does not include the drop wire to a customer's actual premises.

6. **Clarification of the terms DLR and DLR-like:** CLECs requested an explanation of the meaning of the terms DLR and DLR-like as used by SBC in its POR. SBC provided clarification.

7. **Continued Support for Pre-Qualification:** SBC agreed to include an affirmative statement in its addendum to the POR that it will continue to make available a pre-qualification process through Datagate and EDI in any service area where it is currently available.

8. **Additional Data Elements in Pre-Qualification:** SBC agreed to unmask all of the data fields currently available in its pre-qualification mini database. Currently three fields are available: 26-gauge equivalent loop length, red/yellow/green indicator and taper code. SBC will unmask two other fields -- wire center code and design cable gauge makeup -- on March 18, 2000.

9. **Incorporating Reference to Change Management Process:** SBC agreed to include a reference to requirements of the Change Management Process when making requested modifications to its OSS through the POR process.

10. **Methods and Procedures Documents for EDI/Datagate:** CLECs requested detailed documents, often referred to as Methods and Procedures internal in the Bell system, describing precisely what changes are being made to its OSS for the pre-ordering and ordering enhancements in the POR. The information CLECs requested should be much more detailed and broader in scope than the insufficient information regarding modifications to Datagate and EDI that SBC has provided to date on its website. In addition, this document should include a discussion of the exact way in which a CLEC utilizes the system to successfully place a loop order. SBC agreed to provide such a document.

11. **Minutes from November CLEC Meeting:** CLECs requested a copy of minutes from a November 3, 1999 meeting with CLECs be distributed for clarification of two issues. The first was to determine the working definition CLECs and SBC had agreed to regarding a remote switching unit because personnel at the February workshops indicated they were unsure of the definition of an RSU. The second was to verify that CLECs had requested a list of numerous additional loop

qualification data elements in November that were not included in SBC's POR. Although SBC distributed the minutes, which referenced the list of data elements, that attachment was not provided. Thus, the CLECs are providing that list with this notification as Attachment B.

12. **Layout of Ameritech address fields:** CLECs requested that SBC ensure the layout of specific address fields in Ameritech region will be consistent with those in SBC's other service areas. SBC agreed.

13. **Number of PORs to be issued by SBC:** SBC agreed to make an affirmative statement in its POR addendum indicating that it will issue five PORs related to OSS issues for pre-ordering and ordering for advanced services. An SBC representative had indicated at the January 19, 2000 meeting that SBC intended to issue 13 PORs. CLECs expressed concerns that by dividing OSS issues arbitrarily into 13 different PORs, each with a limited 30-day comment window, it would be impossible for CLECs to make a comprehensive determination whether all of their needs would ever be addressed.

IV. Unresolved Issues

Although some progress was made at the February workshops, many CLEC issues were not addressed. Some of these issues were discussed, but agreement was not reached. However, the vast majority of issues still in dispute were unresolved because SBC refused to discuss them. SBC insisted throughout the workshop process that many issues directly related to pre-ordering and ordering xDSL capable loops were "outside the scope" of the POR. The most significant unresolved issues are discussed below.

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A. Access to all SBC Records, Databases and Back-End Systems

CLECS have requested, and the Texas PUC and the FCC have ordered, that SBC provide CLECs with real-time, mechanized access to all records, databases, and back-end systems available to SBC's own personnel, including LFACs (SBC's primary loop assignment and tracking system), LEAD, and TIRKS. Such information should include aggregate planning data such as percentage of DLC at each wire center. SBC's POR does not discuss access to such records, databases and back-end systems. During the February workshop, SBC indicated it will make such access available to CLECs in Texas, but provided no detail. SBC refused to commit to making such access available in any other state.

CLECs hereby request that SBC identify specifically which databases and back-end systems contain any loop makeup information available to SBC's own personnel, whether engineering or otherwise. In addition, CLECs request that SBC indicate all such information that is available and whether SBC intends to make access available to CLECs directly to those databases, or through population of created databases, and whether SBC will provide electronic real-time access.

B. Support for and Modification to CLEC User Interfaces

Many CLECs expressed concerns that SBC's POR fails to discuss future support or enhancements for graphical user interfaces ("GUI") used by CLECs to access SBC's pre-ordering and ordering systems. Among those GUIs are Verigate, LEX and WebGUI. SBC repeatedly indicated that discussion of such front-end interfaces was "outside the scope of the POR." While SBC suggested that these issues might be discussed in another POR, CLECs believe that changes to these front-end interfaces are inextricably linked to

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changes to SBC's DataGate and EDI interfaces and therefore must be discussed in this POR.

C. Population of Data

The POR is deficient in not requiring the updating of relevant databases to incorporate necessary loop makeup data. To the extent the existing databases do not contain loop make-up data (or that data is incomplete) that information should be incorporated or updated in the pertinent databases as manual loop qualifications or engineering queries are performed. Such updates of loop makeup information will be done for Ameritech service regions.

Additionally, SBC indicated that it would not discuss any efforts to transfer loop makeup information currently contained in manual records to automated databases. This topic was considered by SBC to be "outside the scope of the POR."

D. Real-Time Flow-Through of CLEC Orders

CLECs have requested that SBC describe in detail how it will implement a real-time flow-through pre-ordering and ordering system for xDSL loops. SBC did not address this issue in its POR and indicated repeatedly that it is "outside the scope of the POR." During the February workshops, SBC did acknowledge that SBC must make a real-time flow-through system available in Texas as a result of the Rhythms/Covad arbitration. However, SBC would not discuss flow-through for any other service area and did not provide details on its flow-through system for Texas. CLECs are mystified how SBC could consider flow-through to be outside the scope of a POR that is supposed to describe modifications to OSS pre-ordering and ordering systems in order to support mechanized (i.e., flow-through) systems.

E. Pre-ordering and Ordering Intervals

SBC's POR provided limited information on time intervals for critical steps in the pre-ordering and ordering processes. In their comments and again at the workshop, CLECs requested additional discussion and commitments from SBC. However, SBC repeatedly stated that intervals were "outside the scope of the POR." Without commitments regarding pre-ordering and ordering intervals, CLECs will be seriously handicapped. CLECs hereby request that SBC be required to provide at least the following information regarding intervals.

- CLECs request that statistical support data (or at a minimum historical results) be provided for validating the various processing intervals. Inconsistent processes will cause delays in CLEC ordering.

- The POR does not discuss intervals for Firm Order Commitments ("FOCs") or loop order rejections. The FOC is the critical, final step of the ordering process and is used by the CLEC as the basis for scheduling additional work necessary to deliver end user services. FOC delivery intervals must be addressed in the POR, especially in light of CLEC experiences in which SBC issues order rejections as many as five days after giving CLECs a FOC.

- CLECs request that the POR include clear timeline intervals for each step of the pre-ordering and ordering processes including loop qualification.

- Rejects are clearly part of the ordering process, therefore, SBC must be required to discuss this matter in the POR process. Improper or avoidable rejections cause unnecessary delays and work for both CLECs and SBC.

- SBC should be required to provide a description of the reject process that clearly defines each step and the responsibilities of each party in clearing the reject.

- During both of the November 1999 meetings, the CLECs requested access to order status capabilities comparable to, or the same as, the capabilities offered to CLECs in the Pacific Bell region through the Provisioning Order Status ("POS") system. The Plan of Record is silent regarding this specific CLEC request. SBC declined to discuss order status functionality at the workshop, thus no agreement was reached as to the capabilities SBC will make available to CLECs.

F. Parity

In their comments and at the workshops, CLECs requested a detailed explanation of the way in which SBC supports pre-ordering and ordering for its internal ADSL operations, and/or its advanced services affiliates. SBC personnel acknowledged that SBC's internal DSL operations utilized pre-ordering and ordering systems different than those used by CLECs. However, the personnel indicated they had no additional information regarding parity of pre-ordering and ordering systems and considered such information to be "outside the scope of the POR." Without CLECs having such information, SBC could provide systems or capabilities that are not at parity with service provided to SBC Affiliates. CLECs request that the POR establish a process for providing information on systems used by SBC's internal operations and/or advanced services affiliate, and information regarding performance measures for internal versus CLEC systems.

G. Spectrum Management

CLECs have requested, and the Texas PUC and FCC have ordered SBC to dismantle its binder group management/selective feeder separation ("BGM/SFS") system. However, SBC personnel at the workshops indicated that SBC's BGM/SFS system has not been dismantled. SBC should be required to immediately complete the dismantling of its system and to certify to the Commission and state regulators exactly what steps were taken to remove all designations, software modifications, and other changes implemented for or associated with SBC's BGM/SFS system.

H. Line Sharing

CLECs requested in their comments and during the workshops that SBC provide information on the ways in which it would support ordering for line-sharing. CLECs believe this topic is appropriate because the Commission's line sharing order will become effective prior to the closing of Phase II of the POR. SBC declined to provide any details, stating that line sharing was "outside the scope of the POR" and further indicated that OSS issues related to line sharing should be raised in SBC's multiple line sharing user forums.

However, SBC representatives in the initial meeting of the line sharing forum held on January 25, 2000 indicated that the trial would address only operational issues, and not OSS. Further, the line sharing trial will utilize manual ordering systems. In minutes from the January 25, 2000 meeting, SBC stated: "L/S needs to be made available regardless if OSS issues are in place. To the extent that this trial ends May 1 and the deadline is 6/6, we will work with you and not hold up until the OSSs are due. Hopefully the OSS's are ready to go, but we don't think we want to hold up getting the

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central offices equipped waiting for the OSSs." Further, SBC stated in the minutes, "Trial will probably be manual. Billing components, flow through. A finite number of orders manageable by service reps that are walking it through the systems."

SBC must be required to address fully in its POR all OSS issues related to ordering in a line-sharing environment. If CLECs cannot successfully place an order, they will clearly be precluded from fully exercising their rights to line share under the Commission's order.

I. Sample Data

The CLECs requested that SBC provide sample data from its existing loop qualification process for 100 addresses in all 13 states. Such data will greatly facilitate CLEC implementation of SBC's modifications to Datagate and EDI for several reasons. At the February 2, 2000 workshop, SBC refused to supply such sample data. Thus, the CLECs request that the Commission direct SBC to supply such sample data as quickly as possible, as a requirement for completing Phase II.

V. Conclusion

The CLECs have made some progress in addressing OSS issues for pre-ordering and ordering xDSL loops in workshops with SBC. However, many unresolved issues remain, largely due to the unduly narrow scope SBC imposed on the POR process. CLECs believe these unresolved issues are not yet appropriate for arbitration because they have not been fully discussed. Therefore, the CLECs hereby request that the Commission order SBC to continue with additional workshops to resolve all remaining issues. SBC should also be directed to make available personnel knowledgeable in each subject matter area and to make available personnel with the authority to make

commitments to address CLEC requests. If after this process there remain unresolved

issues, CLECs reserve the right to request arbitration pursuant to the Merger Order.[14]

Respectfully submitted

On Behalf of CLECs

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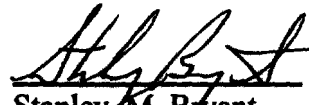
[14] Merger Order, Appendix C, paragraph 15c(2).

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I, Stanley M. Bryant, do hereby certify that on this 7th day of February, 2000, that I have served a copy of the foregoing document via * messenger and U.S. Mail, postage pre-paid, to the following:

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3   SBC/AMERITECH OSS xDSL POR

4   COLLABORATIVE WORKSHOP

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15   TRANSCRIPT OF PROCEEDINGS

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17   Dallas, Texas

18

19   February 1, 2000

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25   George A. Haas, CSR 5939

1   interface were available it would be a part of

2   that.

3   MR. TALBOT: Okay. We tried to capture

4   that in the mix. This is one of those items that I

5   definitely think, when we produce the document that

6   can be our addendum, that, you know, we make sure

7   we state.

8   MR. HALBACH: In one of the handouts we

9   talked about that.

10   MR. TALBOT: What else can we talk about

11   in terms of the scope here for to us get started?

12   Let's start to talk about, again, the

13   fact that we can agree this is the scope, and then

14   let's either take another step of let's work on in

15   scope or out of scope, or let's go through, maybe

16   as Pat suggested, the matrix and identify the other

17   items to be in scope that we want to address around

18   this.

19   My sense would be to try to get to the

20   meat issues. I think in some, what are the meat

21   issues, we can probably get through a little

22   quicker around what we told you in terms of these

23   enhancements.

24   In terms of preorder, that enhancement

25   is really around loop qualification information.

1   What comments, what concerns do you have around

2   what we said we are going to enhance in terms of

3   loop qualification information for preorder?

4   MR. HALBACH: For the record, just with

5   this group, do we have agreement that that's the

6   scope?

7   MS. STORCH: The entire scope? I don't

8   agree. I mean, but obviously you are going to put

9   down what you want.

10   MS. CHAPMAN: Do we have agreement that's

11   the scope of the POR? Is this the scope of the

12   POR? We have, I think, we have to have agreement

13   on that.

14   MS. CHAMBERS: I might suggest, I don't

15   know that we are going to actually come to

16   agreement, but we could perhaps say that's going to

17   be the operating principle for today's meeting;

18   that that definition of the scope, in order to at

19   least get through discussions and get us off the

20   ball, would work.

21   MS. STORCH: Okay.

22   MS. CHAMBERS: I don't think legally any of

23   us are going to agree that's the scope, that narrow

24   of a definition. For today's purposes it would at

25   least move us forward.

1   MR. TALBOT: I appreciate that that's

2   where we would like to come from collaboratively.

3   Let's get started.   I know what we

4   were struggling with on the 19th was a way to get

5   started.   Today we are still doing that.

6   MS. STORCH: In your comment, I appreciate

7   that.

8   MR. TALBOT: I think we need to try to work

9   towards this and see if it flushes out things and

10   work out toward where with can we talk about the

11   resolution of my issue, so we start to make some

12   progress about this.

13   Can I get concurrence this is where we

14   want to start and this is the scope and we'll start

15   to talk about other items that will be out of

16   scope?

17   MS. STORCH: You asked for can we agree

18   that this is the scope.   The answer is no.   We

19   don't -- I don't believe it is the scope, but I

20   accept the fact that that is what you are going to

21   define as the scope and that's what we are going to

22   talk about.

23   MS. TAFF-RICE: I agree with that.

24   MR. TALBOT: Okay.   Given that, one of the

25   things that -- let's just walk through, maybe

1   for the EDI person, but if you are going to respond

2   and tell me the information is populated or

3   something, why couldn't you respond via the 850 and

4   give me the information once it's available?

5   MR. TALBOT: We would. I think the

6   clarification is where you are asking, where you

7   sent a response and we don't have any information

8   available. You are going to get a response to your

9   850 that tells you that.

10   MR. BRAUCHLE: That's not the case I'm

11   talking about.

12   I'm talking about where I'm asking for

13   actual literal engineering information. I don't

14   see that I'm getting a response to that.

15   MR. PHILLIPS: Can I answer the question?

16   We have defined some transaction sets

17   in DataGate, and as far as I know, we are trying to

18   work the same transactions sets through EDI because

19   it's the same interface.

20   Is that true?

21   MR. TALBOT: No. In this case we are

22   talking about two different things. He's talking

23   about an 850 EDI transaction -- EDI versus

24   DataGate. DataGate doesn't use 850.

25   MR. PHILLIPS: In terms of a pure

1   transaction, regardless of number, it's going to be

2   the same transaction between DataGate and EDI.

3   MR. TALBOT: It actually is the same type

4   of response process.

5   MR. HALBACH: We'll get with our EDI folks

6   and verify for you what the 850 counter response

7   is.

8   MS. LEONARDSON: It was answered at the

9   last meeting, the 850 prequal.   It will come back

10   either design or actual.

11   If the type is design, you send an

12   email saying now I want a look up.   You will get an

13   855 back to your 850, but the indicator will be

14   design, and you will get data for design.   But if

15   you want actual data, the design information was

16   not accurate enough for you to do the

17   qualification, you send an email to say I want

18   actual data.   You send an email saying the data is

19   now available in their system.   Go send another 850

20   for preorder, and at this point you get an actual.

21   That was stated at the last meeting.

22   MR. TALBOT: I think, Rich, in your case,

23   that was your request and our response in each of

24   those scenarios.

25   What we are trying to confirm, where

1   this. We are sorry we did not get into this

2   conversation last week. I know you all wanted to.

3   We did, too. We didn't get there because one of

4   the things going on, we were all trying to actually

5   define what process meant.

6   We felt like we could give you process

7   information in the POR, maybe we didn't give you

8   enough, but we gave you process information. I

9   think what we are trying to say now, in this case,

10   this is process information. Now we have come

11   together in terms of maybe there is a little more

12   understanding of how this is going to work.

13   The other thing we are anticipating,

14   this kind of information will be what we will see

15   produced via the CLEC forum. And where we can

16   update process information a little more clearly on

17   the CLEC websites, we plan to do that.

18   MR. BAROS: If I may, Kevin, a follow up

19   to the list of data elements that are provided in

20   the preorder response.

21   MR. TALBOT: Yes.

22   THE WITNESS: Would you be willing to

23   include as an issue the list of the additional

24   items that you said you would be willing to talk

25   about so we capture that and not let it fall into

1   the cracks.

2   MR. TALBOT: Sure.   In that case what I'd

3   like to see us do, if at all possible, this may be

4   an example, Fred, where in this collaborative, we

5   need to kind of try to make a decision around what

6   SBC is proposing is 19 fields of data in releases

7   coming up in the next month, basically.

8   Do we want to collaborate and say

9   let's do that? Let's say we want that enhancement.

10   We want it at that kind of time frame, and let's

11   set your response up to say when can we do the next

12   enhancement to get those items.

13   I think that's what this collaboration

14   is around. If you want four more elements, for

15   instance, do you want us to kind of stop the press,

16   try to figure out what we can do to get that done,

17   and perhaps have the date go out a little further

18   to accommodate those kinds of facts, or do we kind

19   of process through with this and then say, we have

20   kind of come to an agreement on that. We can agree

21   to those elements in this time frame, but let's do

22   a change request for those other elements. Let's

23   get this scheduled via change management and get

24   you a response back on when we can do these other

25   enhancements.